

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

DAVIS INTERNATIONAL, LLC, HOLDEX, LLC, :
FOSTON MANAGEMENT, LTD, and :
OMNI TRUSTHOUSE, LTD, :

Plaintiffs, :

v. :

C.A. No. 04-1482-GMS

NEW START GROUP CORP., VENITOM CORP., :
PANAMERICAN TRADE CORP., MDM BANK, :
URAL-GORNO METALURGICAL COMPANY, :
EVRAZ HOLDING, MIKHAIL CHERNOI, :
OLEG DERIPASKA, ARNOLD KISLIN, :
MIKHAIL NEKRICH, and :
ISKANDER MAKMUDOV, :

Defendants. :

NOTICE OF FILING OF AMENDED COMPLAINT

TO: Richard I.G. Jones, Jr., Esquire
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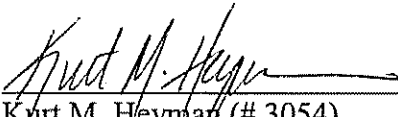
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PLEASE TAKE NOTICE that, pursuant to FED. R. CIV. P. 15(a), plaintiffs are today filing an amended complaint in this action as a matter of course. Pursuant to D. Del. LR 15.1, a form of the amended complaint which indicates the respects in which it differs from the original complaint is attached as Exhibit A hereto.

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Attorneys for Plaintiffs

Dated: April 26, 2005

CERTIFICATE OF SERVICE


Kurt M. Heyman, Esquire hereby certifies that on April 26, 2005, copies of the foregoing Notice of Filing of Amended Complaint were served electronically and via hand delivery on counsel listed below:

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